DEREK SMITH LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

April 8, 2021

Hon. Analisa Torres
U.S. District Judge, Southern District of New York
500 Pearl Street
New York, New York 10007
VIA ECF

Re: *Arlene Delgado v. Donald J. Trump for President, Inc., et. al.*, No. 1:19-cv-11764-AT

Dear Judge Torres:

This firm represents the above-referenced Plaintiff. We write, with Defendants' consent, to respectfully request a one-week extension of the deadlines imposed in the Court's March 26, 2021 Order (Dkt. 63). There have been no prior requests for this relief.

We make this request because lead counsel Abraham Melamed was out of the office from March 26, 2021 through April 6, 2021 in observance of Passover, and having an additional week will ensure we are able to properly amend the complaint and brief a motion for a permanent injunction. If granted, the new schedule would be:

1. Plaintiff shall file an amended complaint by April 16, 2021;

2. Defendants shall file their supplemental motion to compel and Plaintiff shall file her motion for a permanent injunction by April 23, 2021;

3. The parties shall file their opposition papers by May 6, 2021; and

4. The parties shall file any replies by May 14, 2021.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

_____ /s/ Abe Melamed_____
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cc: All Counsel (via ECF)